

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT F. URBANO,
Plaintiff

v.

AQUA INVESTMENTS, LLC
And ITS PRINCIPALS,
Defendants

CIVIL ACTION

DOCKET NO. 05 CV 11480-MEW

MT LTS

DEFENDANT'S RULE 26 AUTOMATIC DISCLOSURE

The following represents the Defendant's automatic disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure and Local Rule 26.2.

- I. The following individuals witnessed and/or participated in the transaction or occurrence giving rise to the instant claims, or otherwise are believed to have discoverable information about the claim or defenses:
 - A. Frank Pasciuto, Jr.: of 27 Water Street, Suite 106, Wakefield, Massachusetts. He is the manager of Defendant Aqua Investments, LLC. He will provide information with respect to conversations with Mr. Urbano as well as all defenses and counterclaims. He may be reached through the offices of Corrigan, Bennett & Belfort, P.C., 404 Main Street, Suite One, Wilmington, MA 01887 or at 27 Water Street, Wakefield, MA 01880.
 - B. Robert F. Urbano: of 8 Flume Road, Unit 8, Magnolia, Massachusetts. The Plaintiff will testify about the conditions of the premises and the actions of the landlord.
 - C. Laura Lampes: Property manager of 8 Flume Road, Magnolia, Massachusetts. She will testify about conversations she had with the Plaintiff regarding the rental of Unit 8, 8 Flume Road, Magnolia, Massachusetts, and the condition of the premises.
 - D. Thomas Dowd: of North Shore Lead Paint Testing Service, P.O. Box 734,

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Plaintiff's Rule 26 Automatic Disclosure
Urbano v. Aqua Investments, LLC
Civ. Action No. 05 - 11480

Beverly, Massachusetts. He is a certified and licensed Massachusetts lead paint inspector. He will testify about his inspection of Unit 8 and the common areas of 8 Flume Road, Magnolia, Massachusetts, on August 22, 2005, and that his inspection showed that the premises and the building were in compliance with the lead paint laws.

- E. George Martel: He will testify about how he inspected the telephone lines for Unit 8 of 8 Flume Road, Magnolia, Massachusetts, and that telephone service problems in the Unit were temporary problems from the telephone company, not any fault of Aqua Investments, LLC.
- F. Jonathan Glick: of Paragon Properties, Inc., 581 Boylston Street, #500, Boston, Massachusetts 02116. He was the property manager of premises located at 410 Sandy Bay Terrace, Sandy Bay Estates, Rockport, Massachusetts, which rented an apartment to the Plaintiff beginning on or about March 31, 2001. He will testify about the Plaintiff's prior tenancy and his pattern of conduct with regard to filing complaints against his landlord and Plaintiff's previous lead paint complaint against him, which is identical or substantially similar to the claim made in this case.

II. Copies of responsive documents in the Defendant's possession are attached hereto. Documents that are already in Plaintiff's possession have not been re-produced here. Enclosed are:

- A. Letter of Initial Lead Inspection Compliance (9/26/1994);
- B. Letter of Full Initial Lead Inspection Compliance (8/22/05).
- C. Letter from Robert Urbano to Aqua Investments, LLC, dated 5/30/05
- D. Letter from Robert Urbano to Aqua Investments, LLC, dated 6/22/05
- E. Letter from Robert Urbano to Aqua Investments, LLC, dated 7/4/05
- F. Letter from Robert Urbano to Aqua Investments, LLC, of unknown date regarding his disappointment with the rental of the premises.

III. The following is a list of documents that are in the Defendant's possession but are being withheld:

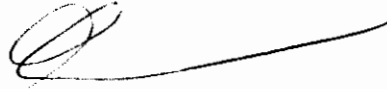
- A. Statements of the Defendant, Aqua Investments, LLC These documents, including notes prepared by the Defendant and its counsel were created in anticipation of litigation and are being withheld as attorney-client privilege and attorney work product.
- B. Research, Reports, and Memoranda Generated by Corrigan, Bennett & Belfort, P.C., Counsel to the Defendant

These documents, including case law, internally produced memoranda and counsels' notes and reports were prepared in anticipation of litigation, are being withheld as attorney-client privilege and attorney work product.

IV. The Defendant has not yet determined who, if anyone, it will call to testify as an expert witness in this matter. However, this response will be seasonably supplemented and Plaintiff will be notified as soon as an expert has been selected.

Respectfully submitted,
Aqua Investments, LLC
By its attorney,

Dated: September 8, 2005

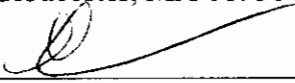


Todd J. Bennett
BBO# 643185
Corrigan, Bennett & Belfort, P.C.
404 Main Street
Wilmington, MA 01887
Tel.: (978) 988-1544

CERTIFICATE OF SERVICE

I, Todd J. Bennett, hereby certify that I served a true copy of the foregoing *Defendant's Rule 26 Automatic Disclosure* via first-class mail this date upon the Plaintiff, pro se, at the following address:

Robert Urbano
8 Flume Road, Unit 8
Gloucester, MA 01930



Todd J. Bennett

Dated: September 8, 2005

LEAD PAINT TESTING
164 REVERE STREET
REVERE, MA 02151
289-2033 389-2033

REG. #

M1599



LETTER OF INITIAL LEAD INSPECTION COMPLIANCE

DATE:

Sept 26 1994

Dear

Mr. Curley

This letter is to certify that I inspected your property located at 8 Plume Rd.
apartment no. 8, and relevant common areas, in the city or town of Magnolia for
dangerous levels of lead according to 105 CMR 460.730(A) through (F): Procedures for Initial
inspection, Regulations for Lead Poisoning Prevention and Control, and determined that there
were no violations. The inspection was conducted on Sept 26 1994.

Please be advised that Massachusetts law requires that only certain residential surfaces
be free of lead paint. Thus, this letter does not mean that your property contains no lead paint.
The premises or dwelling unit and relevant common areas shall remain in compliance only as
long as there continues to be no peeling, chipping, or flaking lead paint or other accessible ma-
terials and as long as coverings forming an effective barrier over such paint and materials remain
in place.

Sincerely,

Inspector

M1599

Registration No.

**NORTH SHORE LEAD PAINT
TESTING SERVICE
1-800-540-5323**

LETTER OF FULL INITIAL LEAD INSPECTION COMPLIANCE

DATE: 8-22-05

Agua Investments LLC
27 Water St
Wakefield MA 01880

Dear Agua Investments LLC

This letter is to certify that I inspected your property located at 8 Flume Rd apartment no. 8, and relevant common areas, in the City or Town of Gloucester, for dangerous levels of lead according to 105 CMR 460.730 of the Regulations for Lead Poisoning Prevention and Control, and determined that there were no violations of the Lead Law. The inspection was conducted on 8-22-05.

Please be advised that Massachusetts law requires that only certain residential surfaces be free of lead paint. Thus, this letter does not mean that your property contains no lead paint. The premises or dwelling unit and relevant common areas shall remain in compliance only as long as there continues to be no peeling, chipping, or flaking lead paint or other accessible materials and as long as coverings forming an effective barrier over such paint and materials remain in place. The regulations grant you a 30-day maintenance period to repair deteriorated lead paint or detached coverings over such paint, and to clean up, during which time this Letter remains valid. The initial inspection report indicates which surfaces, if any, contain a dangerous level of lead, as well as those surfaces, if any, that were covered upon initial inspection.

ORIGINAL

Sincerely,

Thomas Dowd
Inspector

M1170
DPH License Number

Should you have any questions about this letter, call the Department of Public Health at 1-800-532-9571.

Lead Inspection / Risk Assessment Report

Page 1 of 7

**NORTH SHORE LEAD PAINT
TESTING SERVICE**
1-800-540-5323

Method Used:
☒ Na₂S Exp. Date 9-10-05
☒ X-Ray Fluorescence
Model Wm Serial # 213

St.# 8 Address FLUME ROAD
City GROUCESTER (MAGNOLIA) Zip Code 01930

Apt. 8

Owner Name: Aqua Investments LLC
Owner Address: 27 Water St #106
Wakefield MA 01880

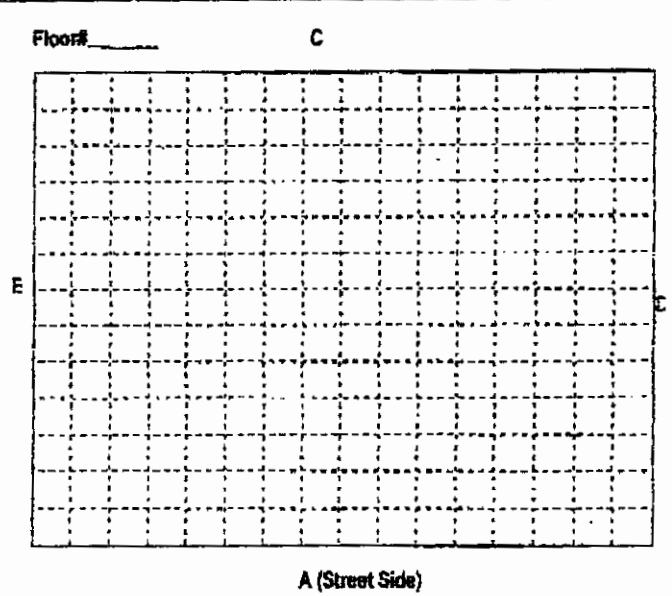
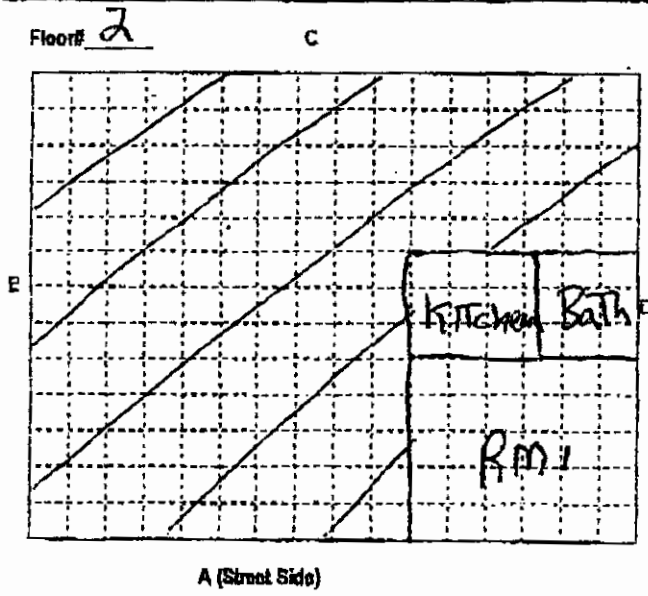
Single Family ☐
Multi Family ☒
Units
Condominium ☐
Day Care ☐

Client Name (if different from owner):
Client Address:

Key:	Inspection	Deleading	Other
AM	Accessible/Mouthable	CAP	Capped
CAP	Capped	COV	Covered
COV	Covered	DIP	Dipped
INT	Intact	ENC	Encapsulated
L	Loose	MI	Made Intact
MI	Moveable/Impacted	PRE	Prepared
MET	Metal	REM	Removed
NA	Not Accessible	REP	Replaced
NC	No Coating	REV	Reversed
NEG	Negative	SCR	Scraped
POS	Positive	VR	Vinyl Replacement
VR	Vinyl Replacement		

☒ Comprehensive Inspection (Y/N)

Comments:



Pb (lead) equal to or greater than 1.0 mg/cm² with x-ray fluorescence or positive with Na₂S is Dangerous.

INSP. DATE
8-22-05

Lead Hazards? (Y or N)
N

Tom Dowd
Inspector (print)

Thomas Dowd
Signature

M1170
Lic.#

R.A. DATE

Urgent Lead Hazards? (Y or N)

Risk Assessor (print)

Signature

Lic.#

EXPLANATION OF LEAD INSPECTION / RISK ASSESSMENT REPORT FORM COLUMNS

This page provides general information needed to understand the lead inspection/risk assessment report. However, you should speak with the inspector/risk assessor before you start to do any work on your home.

SIDE	Refers to A, B, C, or D side of the building or room. See the diagram on the cover sheet. The "A" side of the building or room is the side facing the street that gives the property its address (usually, it is the front of the building). Keeping your back to this street, from the "A" side move clockwise to the "B" side on your left, the "C" side opposite you, and the "D" side to the right.
LOCATION/ SURFACE	Refers to the building component(s) being tested. Some surfaces may be made up of more than one part. For example, "Baseboard" may refer to four separate pieces of wood (one on each wall), but is still considered one surface.
LEAD	<p>The actual lead result. Each surface tested must have a result recorded in the "Lead" column.</p> <ul style="list-style-type: none"> A number shows that the surface was tested with an XRF analyzer. A number (or average number) equal to or greater than 1.0 mg/cm² is a dangerous level of lead. A "pos" or "neg" shows that the surface was tested with sodium sulfide. "Pos" means that there is a dangerous level of lead. "N/A" means that the inspector was not able to test the surface. Unless the owner can get a sample to test, the inspector must assume the surface contains lead and require it to be delead, if necessary. "Metal" means that a metal surface was not tested and only needs to be intact. However, metal handrails, metal window sills, and metal railing caps, need to be delead if they are equal to or greater than 1.0 mg/cm², "pos," or is "N/A."
TYPE OF HAZARD	<p>Not all lead paint must be delead. This column tells you IF and WHY a surface needs deleading. The deleading standards below may not apply for Interim Controls. Speak to your risk assessor for more information.</p> <ul style="list-style-type: none"> M/I circled means that the surface is a moveable/impacted surface and must be delead in its entirety. A/M circled means that the surface is "accessible mouthable" and must be delead to a minimum of five feet high, four inches in from the edge or corner. L circled means that the surface is loose and must, at minimum, be made intact. If more than one choice is circled, the rules for deleading may change depending upon what method of deleading you choose. Speak to the inspector for more information. "N/A" means the inspector was unable to determine if the surface was loose or intact. The person doing the deleading must check this surface and follow all the rules for deleading. Speak to the inspector for more information. If nothing is circled or marked "N/A" then it is likely the surface does not need deleading. Speak to the inspector for more information.
URG HAZ?	This column is only completed during a risk assessment. A risk assessment is an evaluation of a home's suitability for Interim Controls. Only a licensed risk assessor can do a risk assessment, not all inspectors are risk assessors. If "Y" is circled, then this surface is considered an "Urgent Lead Hazard" and some type of deleading work is required to qualify for Interim Control.
IC DATE	The date the licensed risk assessor determines the surface meets the standards for Interim Control.
IC METH	The deleading method or structural repair done to qualify the surface for Interim Control. Refer to the deleading codes key on the cover page.
DELEAD DATE	The date that the lead inspector or risk assessor reinspects the surface and finds that it has been successfully delead for full compliance.
DELEAD METH	The deleading method used to bring a surface into full compliance. Refer to deleading codes in the Key on the cover page of the inspection report.
EXCLUDED SURFACES	The amount of loose paint on a surface as measured by the lead inspector. "N/A" means that the inspector was not able to measure the loose paint, but has determined it is more than the cut-off for moderate risk making intact. Surfaces listed here can only be made intact by a licensed deleader. Note there are still other low and moderate-risk deleading activities, such as covering, that may be done by someone who is not a licensed deleader.
SOIL TEST RESULTS	This information is found on the exterior pages. If your property receives certain federal funding, soil testing may be required. There is also a space for the risk assessor to indicate amount of bare soil, laboratory results, method of remediation, and the date of remediation. Check with your funding agency for more information.

Zip

Common Areas previously tested + PCAD Today

Inspector (print) Tom Dowd

Lic# M1170

Signature Thomas Dowd

Date 8-22-05

Page 5

Risk Assessor (print)

Lic#

Signature

Date

Address of Property

8 Flume

Rd

Apt# 8

City Magnolia
Gloucester

Room LR1

CONTINUED

SIDE	LOCATION/SURFACE	LEAD	TYPE OF HAZARD	URG	IC DATE	IC METH	DELEAD DATE	DELEAD METH	SIDE	LOCATION/SURFACE	LEAD	TYPE OF HAZARD	URG	IC DATE	IC METH	DELEAD DATE	DELEAD METH
A B C D	Up Walls	X	ARM L N/A	Y						Window Sill	MM	ARM L N/A	Y				
A B C D	Low Walls	X	ARM L N/A	Y						Win Apron		ARM L N/A	Y				
A B C D	Baseboards	X	ARM L N/A	Y						Win Casing		ARM L N/A	Y				
A B C D	Chair Rail	X	ARM L N/A	Y						Header Stop	MM	ARM L N/A	Y				
A B C D	Radiators	X	ARM L N/A	Y						Trim Stops	MM	ARM L N/A	Y				
	Floor	X	ARM L N/A	Y						Win Int Sash	MM	ARM L N/A	Y				
	Ceiling	X	ARM L N/A	Y						Exterior Sill	MM	L N/A	Y				
	Door	0.1	ARM L N/A	Y						Post Bead	MM	L N/A	Y				
	Door Casing	0.0	ARM L N/A	Y						Blind Stop	MM	L N/A	Y				
	Door Jamb	0.1	ARM L N/A	Y						Win Ext Sash	MM	L N/A	Y				
	Threshold	Carpenter	ARM L N/A	Y						Window Sill	MM	ARM L N/A	Y				
	Door	0.1	ARM L N/A	Y						Win Apron		ARM L N/A	Y				
	Door Casing	0.0	ARM L N/A	Y						Win Casing		ARM L N/A	Y				
	Door Jamb	0.1	ARM L N/A	Y						Header Stop	MM	ARM L N/A	Y				
	Threshold	Carpenter	ARM L N/A	Y						Trim Stops	MM	ARM L N/A	Y				
	Door	X	ARM L N/A	Y						Win Int Sash	MM	ARM L N/A	Y				
	Door Casing	X	ARM L N/A	Y						Exterior Sill	MM	L N/A	Y				
	Door Jamb	X	ARM L N/A	Y						Post Bead	MM	L N/A	Y				
	Threshold	X	ARM L N/A	Y						Blind Stop	MM	L N/A	Y				
	Door	X	ARM L N/A	Y						Win Ext Sash	MM	L N/A	Y				
	Door Casing	X	ARM L N/A	Y						Closed Door	0.1	ARM L N/A	Y				
	Door Jamb	X	ARM L N/A	Y						CI Casing	0.0	ARM L N/A	Y				
	Threshold	X	ARM L N/A	Y						Closed Jamb	0.1	ARM L N/A	Y				
	Window Sill	MM	ARM L N/A	Y						Closed Walls	Carpenter	ARM L N/A	Y				
	Win Apron		ARM L N/A	Y						CI Baseboard	X	ARM L N/A	Y				
	Win Casing		ARM L N/A	Y						Closed Pole	0.0	ARM L N/A	Y				
	Header Stop	MM	ARM L N/A	Y						Closed Sash	0.1	ARM L N/A	Y				
	Trim Stops	MM	ARM L N/A	Y						CI Supports	0.1	ARM L N/A	Y				
	Win Int Sash	MM	ARM L N/A	Y						Closed Floor	0.0	ARM L N/A	Y				
	Exterior Sill	MM	L N/A	Y						Closed Ceiling	0.0	ARM L N/A	Y				
	Post Bead	MM	L N/A	Y						Staples	X	ARM L N/A	Y				
	Blind Stop	MM	L N/A	Y						Welding	X	ARM L N/A	Y				
	Win Ext Sash	MM	L N/A	Y							MM	ARM L N/A	Y				
			MM	ARM L N/A	Y						MM	ARM L N/A	Y				
			MM	ARM L N/A	Y						MM	ARM L N/A	Y				
			MM	ARM L N/A	Y						MM	ARM L N/A	Y				
			MM	ARM L N/A	Y						MM	ARM L N/A	Y				

COMMENTS / STRUCTURAL DEFECTS:

EXCLUDED SURFACES: Surfaces listed in these boxes can be made intact only by a licensed deleader.

SIDE	LOCATION	MEASURE: LOOSE PAINT (MORE THAN 200 SQ. IN.)	IC DATE	IC METHOD	SIDE	LOCATION	MEASURE: LOOSE PAINT (MORE THAN 200 SQ. IN.)	IC DATE

SIDE	LOCATION	MEASURE: LOOSE PAINT (MORE THAN 288 SQ. IN.)	IC DATE	IC METHOD

Inspector (print) Tom David Lic# R1170 Signature Thomas David Date 8/22/05
Risk Assessor (print) Tom David Lic# R1170 Signature Thomas David Date 8/22/05
Address of Property 8 Flume Rd Apt # 8 City Glooucester (Magnolia)

BATHROOM

SIDE	LOCATION/ SURFACE	LEAD	TYPE OF HAZARD	URG HAZ?	IC DATE	IC METH	DELEAD DATE	DELEAD METH	SIDE	LOCATION/ SURFACE	LEAD	TYPE OF HAZARD	URG HAZ?	IC DATE	IC METH	DELEAD DATE	DELEAD METH
A B C D	Up Walls	0.0	AM L N/A	Y						Low Cab Frame		AM L N/A	Y				
A B C D	Low Walls	TILE	AM L N/A	Y						Low Cab Door		AM L N/A	Y				
A B C D	Baseboards	PLASTER	AM L N/A	Y						Low Cab Walls	X	AM L N/A	Y				
A B C D	Chair Rail	TILE	AM L N/A	Y						Low Cab Shhrs	X	AM L N/A	Y				
	Radiator	0.0	AM L N/A	Y						Supports	X	AM L N/A	Y				
	Floor	LINO	AM L N/A	Y						Drawers		AM L N/A	Y				
	Ceiling	0.0	AM L N/A	Y						Closet Door	0.1	AM L N/A	Y				
	Door	0.1	AM L N/A	Y						Closet Casing	0.1	AM L N/A	Y				
A	Door Casing	0.2	AM L N/A	Y						Closet Jamb	0.0	AM L N/A	Y				
	Door Jamb	0.1	AM L N/A	Y					B	Closet Walls	0.1	AM L N/A	Y				
	Threshold	LINO	AM L N/A	Y						Cl Baseboard		AM L N/A	Y				
	Door		AM L N/A	Y						Closet Pole		AM L N/A	Y				
	Door Casing	X	AM L N/A	Y						Closet Shelf	0.1	AM L N/A	Y				
	Door Jamb	X	AM L N/A	Y						Clos Supports	0.0	AM L N/A	Y				
	Threshold	X	AM L N/A	Y						Closet Floor	LINO	AM L N/A	Y				
	Window Sill	0.0	MI AM L N/A	Y						Closet Ceiling	0.0	AM L N/A	Y				
	Win Apron	0.1	AM L N/A	Y								MI AM L N/A	Y				
	Win Casing	0.1	AM L N/A	Y								MI AM L N/A	Y				
	Header Stop	0.0	MI AM L N/A	Y								MI AM L N/A	Y				
	Int Slope	0.1	MI AM L N/A	Y								MI AM L N/A	Y				
	Win Int Sash	VR	MI AM L N/A	Y								MI AM L N/A	Y				
D	Exterior Sill	VR	MI AM L N/A	Y								MI AM L N/A	Y				
	Paint Bead	VR	MI AM L N/A	Y								MI AM L N/A	Y				
	Blind Stop	VR	MI AM L N/A	Y								MI AM L N/A	Y				
	Win Ext Sash	VR	MI AM L N/A	Y								MI AM L N/A	Y				
	Up Cab Frame		AM L N/A	Y								MI AM L N/A	Y				
	Up Cab Door	X	AM L N/A	Y								MI AM L N/A	Y				
	Up Cab Walls	X	AM L N/A	Y								MI AM L N/A	Y				
	Up Cab Shhrs	X	AM L N/A	Y								MI AM L N/A	Y				
	Supports		AM L N/A	Y								MI AM L N/A	Y				
			MI AM L N/A	Y								MI AM L N/A	Y				
			MI AM L N/A	Y								MI AM L N/A	Y				
			MI AM L N/A	Y								MI AM L N/A	Y				

COMMENTS / STRUCTURAL DEFECTS:

EXCLUDED SURFACES: Surfaces listed in these boxes can be made intact only by a licensed deleader.

SIDE	LOCATION	MEASURE: LOOSE PAINT (MORE THAN 288 SQ. IN.)	IC DATE	IC METHOD	SIDE	LOCATION	MEASURE: LOOSE PAINT (MORE THAN 288 SQ. IN.)	IC DATE

JAN-29-1996 00:12

P.02/09

TOM DOWD

DBA

North Shore Lead Paint Testing Service

P.O. BOX 734 • BEVERLY, MASSACHUSETTS 01915

(978) 744-9321

OWNER Agua Investments LLC
8 Flume Road
(Magnolia) Gloucester

DATE 8-22-05

TELEPHONE _____

TYPE OF PROPERTY INSPECTED:

COST

- ☐ Single Family Dwelling
☐ 2-Family Dwelling
☐ 3-Family Dwelling
☒ Complex
☐ Condominium/Townhouse
☐ Other

TOTAL DUE

A copy of this document is on file at NSLPTS.

C

May 30, 2005

Aqua Investments LLC
Wakefield Mass.

Att: Frank Pashuto

Dear Frank,

Due to the your failure to comply with legal terms for renting my apartment, I am faced with moving expense. My expense for moving in was \$210 and due to the circumstances I expect reimbursement from you. You should also reconsider my request for defraying one month's rent of \$675?

Sincerely,



Robert F. Urbano
PO Box 164 Rockport MA 01966

Cc: file

①

June 22, 2005

Aqua Investments LLC
27 Water St
Wakefield Mass.

Att: Frank Pashuto

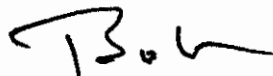
Frank,

I left a message with Laura Lampas on Monday but no reply.

I am unable to get into my mailbox since there is something wrong with the lock and I have left the key taped to the box.

This requires immediate attention or contacting Public Health.

Sincerely



Robert F. Urbano
Unit 8 at 8 Flume Rd
Gloucester MA 01930

cc: file

July 4, 2005

Aqua Investments LLC
27 Water Street
Wakefield MA 01880

Dear Sirs:

Apt 8 at 8 Flume Road in Gloucester MA 01930:

The refrigerator is running continuously no matter how low the settings.

This can be attended to in court where it will be your expense or you can attend to it and other problems immediately.

Most Sincerely,


Robert F. Urbano

F

Frank Pashuto
Aqua Investments

Dear Frank,

I am disappointed with the rental of 8 Flume Rd, Magnolia unit 8 since it was presented to me as ready to move in; it was and is not.

You are aware that I had no telephone for 3 weeks, no water in the kitchen, trouble with the electric and at first no telephone jack for my computers. I still do not have a TV Jack and an outlet painted over and non-functional. The thermostat does not function properly and must be turned on completely for heat. You were made aware of these problems.

Further, I find that the air-conditioner does not have a near outlet to plug into. I am not fond of extension cords particularly for an air-conditioner which practice can lead to a fire. Further the outlets anywhere near I need for other functions. I do not know what other problems might arise.

When I have a rental, the first thing I do is to check out the property to determine if it is ready for occupancy. Even the telephone can be checked to determine if there is a dial tone and certainly turning on the water is simple. This preview practice can save lots of headaches; I suggest adopting it before you get into a really difficult situation.

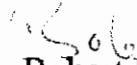
In sum, my contention is that you forgive the first month's rent in view of the partial use of the apartment and the aggravation and stress I endured and possible loss of business due to lack of a phone. My real estate customers frequently call me at home.

Otherwise, I am giving you thirty-days notice and using the last-month rent for June.

I suspect that you have an attorney advising you on properly following rental law? In any event, you have violated all of the housing laws. I cannot give you legal advice but I can show you the forms and law that must be followed. By ignoring the law, you are leaving yourself liable for perhaps hundreds of thousands or more in law suits and fines for every single infraction of housing law. Ignorance is not a defense.

If you wish to make an appointment, call me at 978-526-1519 or 978-283-4300. My charge is \$250 for consultation.

Sincerely,



Robert F. Urbano

cc: file